

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 0:23-CV-81150-RLR

ANDREW TATE & TRISTAN TATE,

Plaintiffs

vs.

[REDACTED], et al.,

Defendants.

/

**DECLARATION OF [REDACTED]
IN SUPPORT OF DEFENDANTS' MOTION FOR PSEUDONYMITY AND MOTION
FOR PARTIAL SEAL AND PROTECTIVE ORDER**

I, [REDACTED], do hereby state as follows:

1. My name is [REDACTED] and I have been named as a Defendant in the above-captioned matter.

2. I am an adult citizen of the United States, and I am competent to testify to the facts set forth in this declaration.

3. In or around April 2022, I was induced to travel to Romania by Tristan Tate under the false pretense of a romantic relationship when instead, I was being lured into his human trafficking operation.

4. I escaped the Tate brothers' compound [REDACTED], when the Romanian government raided the Tate's property and extracted me. The abuse I witnessed and experienced while in Romania was traumatizing. But the harassment and threats I have received in retaliation for cooperating with law enforcement have been even worse. As a result, I live in constant fear, and suffer from intense anxiety and depression.

5. The Tates' associates made efforts to release my name to the public and incite harassment against me almost immediately after I escaped. So, I knew the Tates were looking for me, which was terrifying. Since escaping, I have lived in constant fear. Despite all of my efforts to hide and stay quiet, including avoiding the media and refusing all requests for interviews, the harassment by the Tates' associates, the Tates' followers, and now the Tates directly, has only increased over time.

6. Videos were made by the Tates' associates releasing my private information and identifying me as a victim of the Tates even though the Romanian government had protected my identity for my safety, and I have never identified myself as a victim or witness in the Romanian prosecution publicly, until now.

7. As a result of the videos and social media posts made by the Tates' associates releasing my private information and lying about me, I have become the target of an ongoing harassment campaign. I have received hundreds of harassing and threatening messages.

8. Strangers have come to my parents' house and frightened them. Private investigators have come to my parents' house and badgered my friends and acquaintances, asking very invasive questions about me and telling lies about me.

9. My private information has been spread online without my consent many, many times. My private information and data were illegally stolen from me and then publicized online without my consent and out of context to humiliate and harass me.

10. Complete lies and fabrications have been published online about me by the Tates' associates and followers that have then been reshared hundreds of times and used to hurt, harass, and humiliate me. This has only increased since the filing of this lawsuit.

11. Because of these awful lies I feel completely isolated. I am afraid to meet new people because I am worried they will recognize me from all of the terrible things that have been said about me in this lawsuit, and online, and the private images that have been shared without my consent. I feel alienated from my previous support network, friends, and family because I am embarrassed by the terrible things that have been said about me and I want to protect them from harassment by those harassing me.

12. I now have severe trust issues as a result of my experience in Romania and the following harassment. This has made it difficult for me to interact with people on a daily basis, in even the smallest ways. For example, even talking to the person at checkout in a store is very difficult and stressful because I worry that they could recognize me, try to take my picture, and post it online, revealing my location to the Tates or their associates and followers. I feel I always have to hide.

13. This has made it nearly impossible for me to work. I [REDACTED] out of fear I would be recognized. And because of the constant hypervigilance, anxiety, and fear I experience daily, I have trouble concentrating on even the smallest tasks. This has made it extremely difficult to secure regular employment. As a result, I am extremely financially vulnerable and have trouble meeting even my most basic needs of food and shelter.

14. Because I am constantly being harassed, it is impossible for me to move on and live my life. I am constantly reminded of my traumatic experiences in Romania, and even my childhood traumas have been made public by the Tates. This has been extremely retraumatizing and reopened old wounds causing fresh pain and humiliation.

15. The harassment by the Tates has included accusations that [REDACTED]

[REDACTED] which has caused me unspeakable pain [REDACTED]

[REDACTED] and then sent hundreds of messages echoing this accusation and saying horrible, vile things to me has exacerbated my grief and made me feel intense depression, loneliness, and hopelessness.

16. As a result of this ongoing harassment campaign, I have suffered severe bouts of depression. I often have nightmares and difficulty sleeping. The stress has manifested in chronic physical pain and constant headaches. It is difficult to concentrate on anything. I am constantly fearful, sad, and alone. At times it is difficult to even get out of bed. It is completely debilitating.

17. I am always looking over my shoulder. I am in a constant state of hyper-vigilance because people are looking for me. And I believe people are looking for me to hurt me or cause me harm.

18. I am extremely afraid of the Tate Brothers, their associates, and their followers online.

19. And it feels like this will never end as the harassment and threats have only intensified over time. I cannot heal and move on with my life, work, support myself, return to normalcy, until this harassment ends. Until my privacy is restored, I cannot feel peace or safety.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed this 8th day of September, 2023.

[REDACTED]